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8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA

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11 UNITED STATES OF AMERICA,
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13 Plaintiff,
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15 vs.
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17 NAM VIET NGUYEN,
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19 Defendant.

Case No.: 2:18-cr-00291-JAD-BNW

STIPULATION AND PROPOSED
ORDER TO CONTINUE
(First Request)

20 IT IS HEREBY STIPULATED AND AGREED, by and between The United States
21 of America, through Christopher Chiou, Acting United States Attorney, and Shaheen
22 Torgoley, Assistant United States Attorney, counsel for the United States of America, and
23 Shawn R. Perez, Esq., counsel for Nam Viet Nguyen, that the sentencing currently scheduled
24 for December 13, 2021, be vacated and continued to a date and time convenient to the Court,
25 but no sooner than 30 days past the date originally set for sentencing.

26 This stipulation is entered into for the following reasons:

- 27 1. The Defendant is in custody and does not object to the continuance.
28 2. The parties agree to the continuance.
3. The presentence interview was originally scheduled for September 24, 2021 with
USPO Erica Strome. Unfortunately due to an unforeseen family emergency, Ms. Strome had
to travel to Kansas and will not return until October 11, 2021. The report is currently due on

1 October 21, 2021.

2 4. This request is being made to accommodate Ms. Strome's family emergency and to
3 allow her ample time to complete her investigation and report.

4 5. The additional time requested herein is not sought for purposes of delay, but merely
5 to accommodate all parties by allowing the investigation and preparation of the report to be
6 done more thoroughly. Denial of this request could result in the miscarriage of justice.

7 6. This is the first stipulation to continue the date set for sentencing.

8 DATED this 24th day of September, 2021.

9 /s/ Shawn R. Perez, Esq.
10 SHAWN R. PEREZ, ESQ.
11 Counsel for Defendant,
12 Nam Viet Nguyen

Christopher Chiou
Acting United States Attorney

By: /s/ Shaheen Torgoley
SHAHEEN TORGOLEY
Assistant United States Attorney

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,
Plaintiff,
vs.
NAM VIET NGUYEN,
Defendant.

Case No.: 2:18-cr-00291-JAD-PAL

FINDINGS OF FACT

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. The Defendant is in custody and does not object to the continuance.
2. The parties agree to the continuance.
3. The presentence interview was originally scheduled for September 24, 2021 with USPO Erica Strome. Unfortunately due to an unforeseen family emergency, Ms. Strome had to travel to Kansas and will not return until October 11, 2021. The report is currently due on October 21, 2021.
4. This request is being made to accommodate Ms. Strome's family emergency and to allow her ample time to complete her investigation and report.
5. The additional time requested herein is not sought for purposes of delay, but merely to accommodate all parties by allowing the investigation and preparation of the report to be done more thoroughly. Denial of this request could result in the miscarriage of justice.
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ORDER

IT IS THEREFORE ORDERED, that the Sentencing Hearing set for December 13, 2021 be vacated and reset to January 31, 2022, at 11:00 a.m.

IT IS SO ORDERED this 27th day of September, 2021.


UNITED STATES DISTRICT JUDGE